

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE SQUIRRELS RESEARCH LABS LLC, *ET*  
*AL.*

*Debtors*

CASE No. 21-61491-TNAP  
(JOINTLY ADMINISTERED)  
CHAPTER 11  
SUBCHAPTER V  
JUDGE PATTON

---

FREDERIC P. SCHWIEG, TRUSTEE

*Plaintiff*

*V.*

ANDREW GOULD

*Defendant*

ADVERSARY No. 23-06030

ALL DOCUMENTS REGARDING THIS  
MATTER MUST BE IDENTIFIED BY **BOTH**  
ADVERSARY AND BANKRUPTCY CASE  
NUMBERS AND NAME OF JUDGE

**JOINT STIPULATIONS**

Plaintiff and Defendant hereby stipulate to the following for the purposes of this  
adversary proceeding only:

1. The court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334(b) and (d) and General Order 2012-07 of the United States District Court for the Northern District of Ohio.
2. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), (C), (K) and (O).
3. On November 23, 2021 (the "Petition Date"), Squirrels Research Labs LLC ("Debtor") filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").
4. At issue in this matter are certain payments that the Trustee alleges that the Debtor made to the Defendant, as set forth in the attachment to the Complaint and attached hereto both as Exhibit A (the "Payments"). This stipulation is entered for all purposes in this matter, but one specific purpose is to allow the Court to rule on certain issues as a matter of

law. The parties anticipate that said ruling will simplify this matter for trial and may facilitate settlement of at least some claims.

5. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, business-related travel on behalf of the Debtor (“Travel Expense Reimbursements”).

6. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of supplies, materials, electronic components or other goods used to directly produce the Debtor’s products (“Material Expense Reimbursements”).

7. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of materials and services for construction or remodeling of the Debtor’s premises (“Remodeling Reimbursements”).

8. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of office supplies and/or office services (“Office Expense Reimbursements”).

[REMAINDER OF PAGE INTENTIONALLY BLANK]

9. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent in making customer refunds (“Refund Expense Reimbursements”).

Respectfully Submitted,  
/s/ Frederic P. Schwieg

---

Frederic P. Schwieg, Esq. (0030418)  
Attorney at Law  
19885 Detroit Rd #239  
Rocky River, Ohio 44116  
(440) 499-4506  
fschwieg@schwieglaw.com  
Subchapter V Trustee

Respectfully Submitted,  
/s/ Jack Cooper, Esq.

---

Jack B. Cooper, Esq. (0069321)  
Milligan Pusateri  
PO BOX 35459  
4684 Douglas Cir. NW  
Canton OH 44735  
Phone: (234) 209-9793  
Fax: (330) 409-0249  
Email: jcooper@milliganpusateri.com  
Counsel for Defendant

# **EXHIBIT A**

**Squirrels Research Labs LLC**  
**Transactions: Andrew Gould**  
**All Dates**

Account #	Date	Transaction Type	Num	Memo/Description	Amount	A/P Paid	Comments from D Stanfill report
1010 Checking x6063	08/28/2018	Expense		QuickPay with Zelle payment to Andrew Gould 7438691108	3,000.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	03/13/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	1,000.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	03/16/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	250.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	03/17/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	1,000.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	03/19/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	250.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	03/20/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	1,500.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	04/10/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	13,000.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	04/21/2020	Expense		Power Cords-NEMA	1,297.02	Paid	Power Cords-NEMA
1010 Checking x6063	09/16/2020	Expense		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	1,667.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	12/18/2020	Transfer		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	863.00	Paid	Not listed in report provided by D Stanfill
1010 Checking x6063	02/18/2021	Transfer		<i>No Description provided - pymt to acct #1020 Andrew x9736</i>	1,500.00	Paid	Not listed in report provided by D Stanfill
					<b>25,327.02</b>		